
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Dale Montgomery,

Plaintiff,

v.

Pinnacle Credit Services, Worldwide
Recovery, Stephens & Michaels
Associates Inc., Royal Credit Union,
Equable Ascent Financial, Verifacts
Inc, Cavalry Portfolio Svcs, Dynamic
Recovery Services, NCO Financial
System, Inc, Law Office of Joel Cardis,
LLC, North Shore Agency, Inc,
Transworld Systems Inc., Worldwide
Recovery Specialists Inc.,

Defendants.

Case No.: 13-cv-02839-
JNE/FLN

MOTION FOR RELIEF FROM JUDGMENT

COMES NOW the Defendant Pinnacle Credit Services, LLC (“PCS”), by and through its attorney, and hereby moves this Court, pursuant to **Fed. R. Civ. Pro. 60(b)**, for an Order granting Defendant relief from the default judgment entered against Defendant on November 21, 2013 by vacating the judgment on the grounds that the judgment is void for lack of personal jurisdiction due to improper service of process. Said Motion is based upon the attached Memorandum, Exhibits, and all of the files, records, and proceedings herein.

SEILERSCHINDEL, PLLC

Dated: December 6, 2013

/s Kyle D. Moen

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